



Consolidated Planning and Monitoring: Updates for Spring Fiscal Workshop

April 2018



Consolidated Planning & Monitoring

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Our Vision



*Districts and schools in Tennessee will exemplify excellence and equity such that **all students** are equipped with the knowledge and skills to successfully embark upon their chosen path in life.*

Our Priorities

Early Foundations & Literacy

Building skills in early grades to contribute to future success

High School & Bridge to Postsecondary

Preparing significantly more students for postsecondary completion

All Means All

Providing individualized support and opportunities for all students with a focus on those who are furthest behind

Educator Support

Supporting the preparation and development of an exceptional educator workforce



District Empowerment

Providing districts with the tools and autonomy they need to make the best decisions for students

Objectives

- Federal Funding Updates
- Time and Effort
- ESSA Updates and What's on the Horizon
 - ESSA Implementation
 - District and School Planning
 - Schoolwide Consolidation
 - Coordinated Spending
 - Monitoring
- Other Updates
- Resources
- Questions



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Federal Funding Updates

ESSA Appropriations for SY2018-19

Grant Program	Current Federal FY* National Appropriation	Next Federal FY** National Appropriation	Increase/Decrease Nationally
Title I, Part A	\$15,459,802,000	\$15,760,000,000	\$300,198,000 Increase
Title II, Part A	\$2,055,830,000	\$2,055,830,000	Level Funded
Title III	\$737,400,000	\$737,400,000	Level Funded
Title IV, Part A (SSAE)	\$400,000,000	\$1,100,000,000	\$700,000,000 Increase
Title IV, Part B 21 st Century Comm. Learning Centers	\$1,191,673,000	\$1,212,000,000	\$20,327,000 Increase
IDEA Part B	\$12,002,848,000	\$12,278,000,000	\$275,152,000 Increase
IDEA Part C	\$458,556,000	\$470,000,000	\$11,444,000 Increase

Status of ESSA Programs

- Title II A – Preparing, Training, and Recruiting High-Quality Teachers, Principals, or Other School Leaders
 - Level-funded (proposed for elimination for a second year)
 - Program continues to be scrutinized by Secretary

- Title IV
 - 21st Century Community Learning Centers
 - \$1,191,673 \$1,191,673 **\$1,211,673** **+\$20,000**

 - Student Support & Academic Enrichment
 - \$400,000 \$450,000 **\$1,100,000** **+\$700,000**



Time and Effort

Time and Effort

- If federal funds are used for salaries, then time distribution records are required.
- Staff demonstrate [allocability](#) – If employee paid with federal funds, then must show that the employee worked on that specific federal program cost objective. Amount funded must be allocable to the benefit received.
- The key to determining whether it is a single cost objective is whether the employee's salary and wages can be supported in full from each of the Federal awards on which the employee is working or from the Federal award alone if the employee's salary is also paid with non-Federal funds.

Cost Objective - Defined

Cost objective : *Program, function, activity, award, organizational subdivision, contract, or work unit for which cost data are desired and for which provision is made to accumulate and measure the cost of processes, products, jobs, capital projects, etc.*

- Examples: ESSA Consolidated Admin, Parent and Family Engagement, Title I schoolwide program (at school level), IDEA B Admin, Perkins Admin
- Single cost objective = semi annual certification
- Multiple cost objectives = personnel activity reports

Documenting Time and Effort

Semi-Annual Certifications

If an employee works on a single cost objective, certification must:

- Be after the fact
- Account for the total activity
- Signed by employee OR supervisor with first-hand knowledge
- Every six months (at least twice a year)

Personnel Activity Report (PAR)

If an employee works on multiple cost objectives, PAR must:

- Be after the fact
- Account for total activity
- Signed by employee
- Prepared at least monthly and coincide with one or more pay periods

Flexibility with ESSA and UGG

- Time and effort flexibility
 - [OCFO letter](#)
 - Enclosures A-C providing specific information on substitute system at school level
 - Examples of cost objectives and flexibility

- UGG flexibility in documenting time and effort
 - Internal controls
 - Policies and procedures
 - Onboarding new employees on cost objectives

UGG Time and Effort

- Charges for salaries must be based on records that accurately reflect the work performed
 1. Must be supported by a **system of internal controls** which provides reasonable assurance charges are accurate, allowable and properly allocated
 2. Be incorporated into official records
 3. Reasonable reflect total activity for which employee is compensated
 - Percentages may be used for distribution of total activities
 - Not to exceed 100%
- If auditor determines that system does not meet requirement, PARs will be required §200.430(i)(8).



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ESSA Implementation

Status of Tennessee's ESSA Plan

- Plan approved fall of 2017
- *New!* School-level per pupil expenditure reporting
- *New!* Resource allocation review
- ESSA one-pagers – released summer 2018

Additional Data Disaggregation on Report Card

- ESSA maintains the requirement for data disaggregation for accountability purposes for the following subgroups:
 - race/ethnicity, gender,
 - socioeconomic status,
 - disability, and
 - English language learners (ELLs).
- ESSA also adds three new subgroups for data reporting, but not accountability purposes: **homeless status, students with a parent in the military, and students in foster care.**

Requirements that Remain: Supplement not Supplant

- Supplement not supplant (SNS)
 - Change in the test for Title I school level
 - No change in test for Title I district level (traditional test)
- Other Titles – traditional test
 1. State mandate
 2. Provided in non-Title schools by state funds
 3. Provided in prior year w state or other funds
 4. Comparability
- Title I Assurance #19 in CFA

SNS: New Title I School-level Test

- In order for the state to determine allowability for Title I school-level expenditures, the state must submit a written document detailing the following:
 - Method by which the district distributes/allocates state and local funds to its schools (i.e. staffing model, weighted student formula)
 - Information on the components of the model
 - Demonstrate that all schools were treated equitably in the model (demonstrate that Title I schools received their “fair share” or what they earned in that model model).
- No longer an expenditure-by-expenditure test.
- Once met, then Title I funds at the school level can be used more flexibly since they are deemed supplemental in nature.

Requirements that Remain: Maintenance of Effort

- Section 8521: A LEA may receive funds under a covered program for any fiscal year only if the SEA finds that either the combined fiscal effort per student or the aggregate expenditures of the agency and the State for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.
- Section 8521(b)(1) establishes new flexibility. Specifically, an SEA must reduce an LEA's allocation under a covered program if the LEA fails to maintain effort in a given fiscal year **AND** also failed to maintain effort in one or more of the five immediately preceding fiscal years.



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District and School Planning

Planning Pilot

- New planning tool pilot implemented in Jan. 2018
 - 11 participating LEAs (SE CORE, First, UC CORE)
 - New planning tool used for both LEA and school planning for the 2018-19 school year
- Embedded in ePlan
- Available for use by all LEAs and schools beginning in Jan. 2019
- Currently collecting feedback from participating LEAs
- Roll out of the tool in fall 2018
 - Webinars
 - On-site trainings

New Features in the Planning Tool

- New planning tool provides
 - Enhanced data representations
 - Graphs, charts, “call-outs”
 - Ability to rapidly toggle among content areas, grades, schools
 - Data comparisons between comparable LEAs
 - Streamlined process for identifying priority needs
 - Ability to have true collaboration in the planning process
 - Enhanced printing and sharing capabilities
 - Idea sharing functionality

School Planning

- School plans for FY19 will open in ePlan on May 1
 - Webinar on school planning on April 27 @ 1:00 CDT
- School plan training and support available through assigned regional consultants between May and August
- School plans to be completed in ePlan by September 1
- School plans to be reviewed and approved by the LEA by Oct. 1
- Title I schools must upload a budget for Title I funds that aligns with the PPA page in ePlan

School Planning

- A new school plan review template to be provided for use by LEAs
 - Not required; optional
 - Will be used by regional consultants to review approved plans in Dec. and Jan. as a “spot check”
- Identified priority and focus schools will have additional requirements for planning, as required by the Office of School Improvement
 - Plans must be reviewed and approved by the LEA and the TDOE

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Title I School-wide Consolidation

Title I School-wide Consolidation

- Consolidation of funds is an OPTION, not a requirement
- School MUST be operating a Title I school-wide program
- Funds are placed into a single pool to increase flexibility
- Funds included in consolidation lose their identity (blending of funds)
- Funds must be used to meet the intents and purposes of grant programs included in the consolidation
- Some federal statutory and regulatory requirements can be eased *at the school level*

Consolidation Options

- Consolidate only school level federal funds
 - Funds lose their identity
 - School-level program-specific requirements no longer applicable
 - Must meet the intent and purpose of programs included
 - Funds can be used to address the ***educational*** needs identified in the school-wide plan

Consolidation Options

- Consolidate school level state, local and federal funds
 - Funds lose their identity
 - School level program-specific requirements no longer applicable
 - Must meet the intent and purpose of programs included
 - No distinction between federal and non-federal funds
 - Funds can be used to address **any** needs identified in the school-wide plan (may be non-educational)

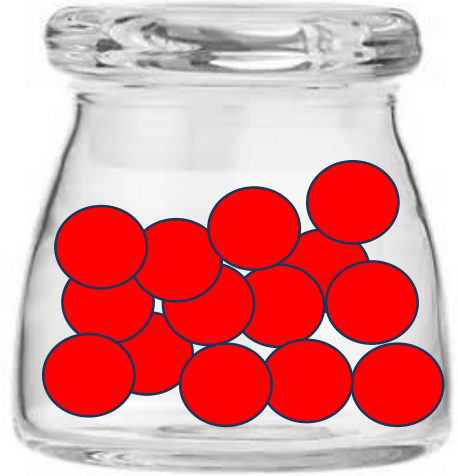
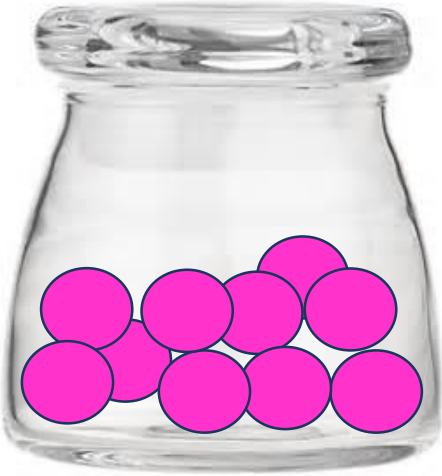
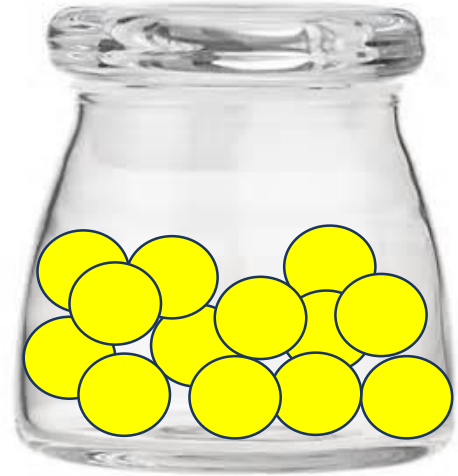
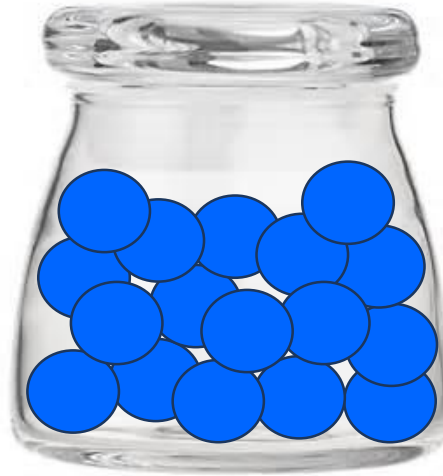
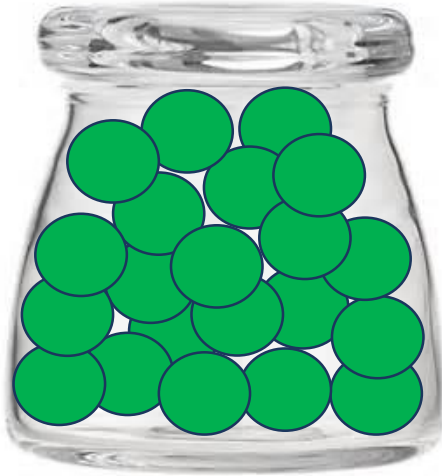
Funds Eligible for Consolidation

- Any federal funds administered by the United States Department of Education (USED) that can be used to support students in public schools
 - Formula funds such as
 - Title I, Part A
 - Title II, Part A
 - Title III
 - IDEA, Part B
 - Perkins
 - Discretionary (competitive) funds
 - Must still complete activities within the funding application
- Head Start and National School Lunch **CANNOT** be included because they are not administered by USED

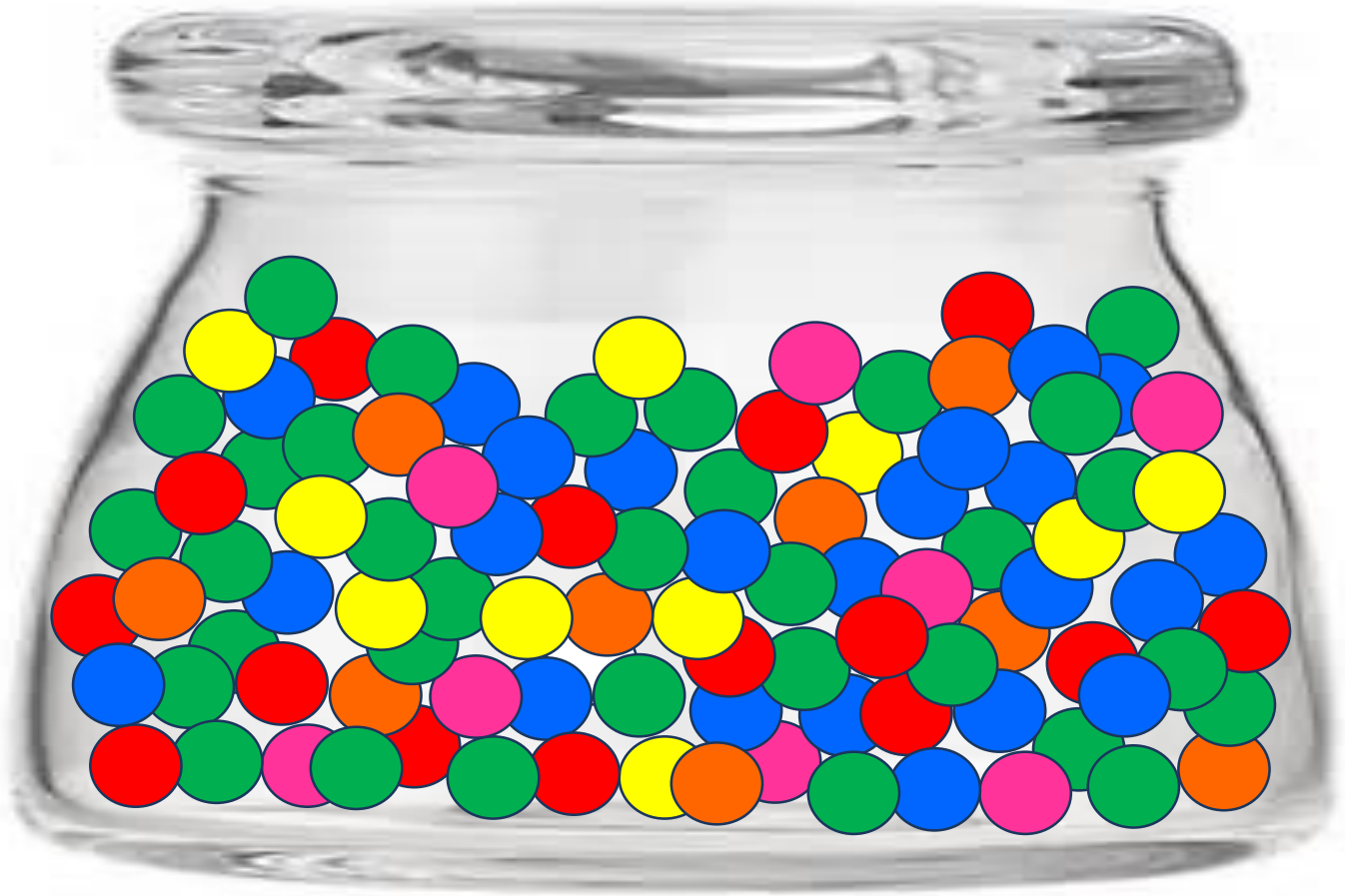
School-wide Pool of Funds

- An LEA and school determine the programs to be included in the consolidation
- The school-wide plan identifies the programs and amounts to be consolidated
- Funds are combined into a single, school-wide pool of funds
- Funds from the pool are used to support the activities outlined in the school-wide plan
- Expenditures are not “tracked” back to specific programs within the pool

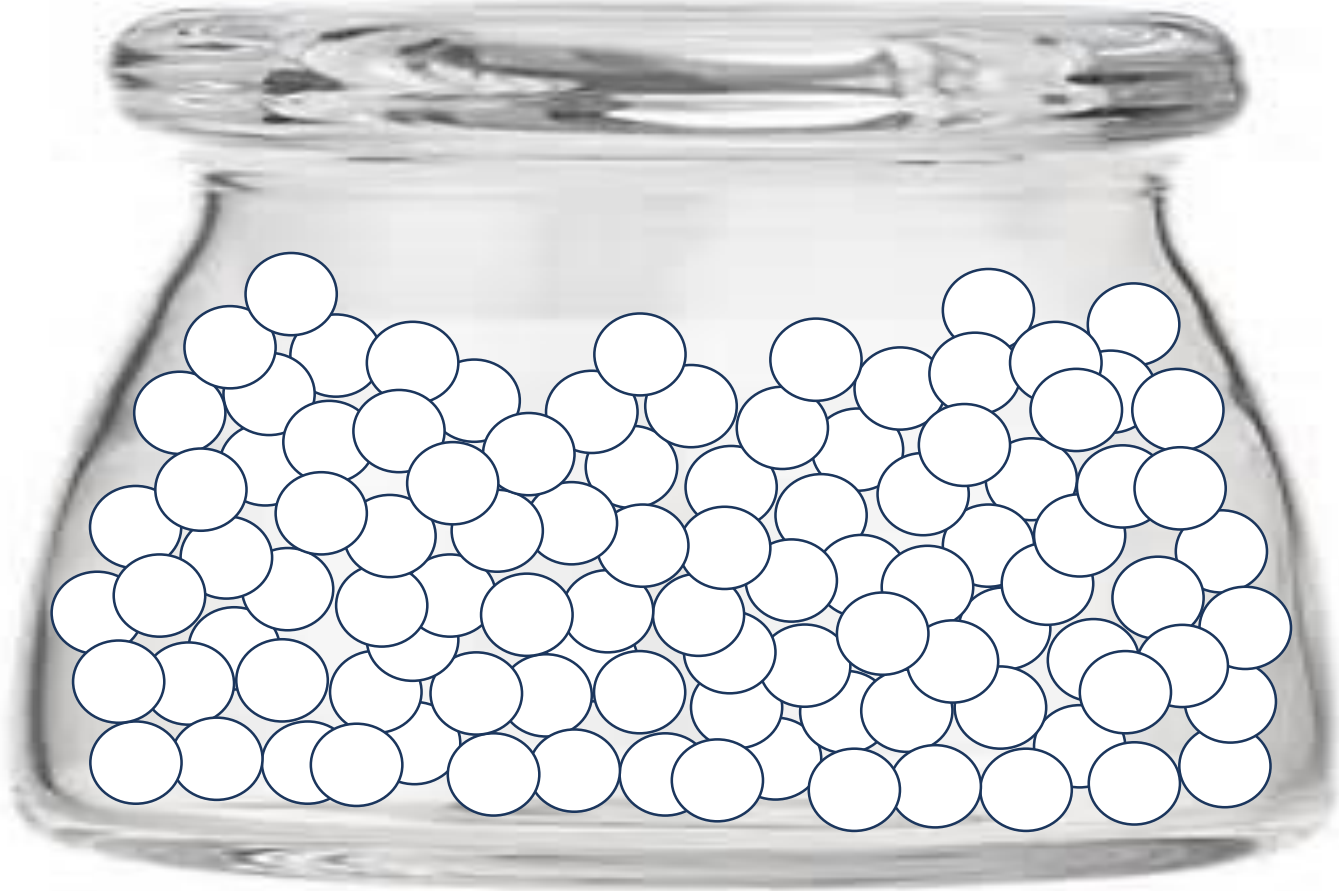
Available Funding Sources



Braiding Funds



Blending of Funds



Selecting Schools to Participate

- Must be a Title I school-wide school
- The schools must have
 - strong principal leadership
 - excellent data analysis, identification of needs, priority setting, goal creation, monitoring of progress
 - strong plan development

Identifying the Funds to be Pooled

- Identify the funds available to the school
- Identify the funds to be consolidated and placed in the school-wide pool

School	Title I	Title II	Title III	Title IV
Oak Lane Elementary	Yes	Yes	No	Yes

Creating the School-wide Pool

- Identify the amount of funds to be contributed from each grant program
- Determine the school-wide pool total for the school
- Determine the percentage that each grant's contribution represents

School	Title I \$	Title II \$	Title IV \$	Total
Oak Lane Elementary	\$97,500	\$18,000	\$3,800	\$119,300
Contribution Percentages	81.7%	15.1%	3.2%	100%

Use the Funds to Support the SW Plan

- The school-wide pool becomes one cost objective
- Funds from the school-wide pool MUST be used to support the school-wide plan
- Allowability is not tracked expenditure by expenditure
- Allowability is determined based on alignment with the school-wide plan
 - If the expenditure does not align with the plan, it is not an allowable school-level Title I expenditure and cannot be charged to the school-wide pool

Tracking Expenditures

- Expenditures are not tracked back to the individual grant programs
- LEA-level fiscal staff track expenditures against
 - The approved school-wide plan
 - The total funds available in the school-wide pool
 - Allowability based on the type of consolidation (federal only or state and federal)
- When the school-wide pool funds are expended in total, no more expenditures can be charged

Submitting Reimbursement Requests

- The total amount of funds spent out of the school-wide pool, during a given period is back-mapped to each contributing grant
- Total expenditure from school-wide pool to be submitted for reimbursement: \$25,000

School	Title I	Title II	Title IV	Total
Oak Lane Elementary	81.7%	15.1%	3.2%	100%
Reimbursement	\$25,000 * 81.7%= \$20,425	\$25,000 * 15.1%= \$3,775	\$25,000 * 3.2%= \$800	Total Reimbursement = \$25,000

Determining Carryover Amounts

- The total amount of funds remaining in the pool is back-mapped to each contributing grant
- Total amount remaining in the school-wide pool, to be carried over: \$6,500

School	Title I	Title II	Title IV	Total
Oak Lane Elementary	81.7%	15.1%	3.2%	100%
Carryover Amount	\$6,500 * 81.7%= \$5,310.50	\$6,500 * 15.1%= \$981.50	\$6,500 * 3.2%= \$208	Total Carryover= \$6,500

Is anyone consolidating right now?

- Yes!
 - We have three districts that will begin year three of implementation in 2018-19
 - The first year of implementation (16-17) has been audited and no problems have been identified
 - Schools have found new flexibilities around uses of funds to meet their needs

Benefits Seen by Participating Schools

- More funds available for needed staff
- Less funds required to be used for grant-specific purposes and more for needs of students in each school
- Less time spent on determining allowability of expenditures
- No expenditure-by-expenditure reviews by auditors

Can I consolidate funds in Title I SW schools?

- Yes!
 - This option is available for any and all Title I SW schools
- When making the decision to participate, consider these keys to success
 - Strong school leadership
 - Well done needs assessment
 - School plan strength
 - Fidelity of implementation of plan
 - Aligned use of funds

Now is the Time!

- As LEAs prepare the FY19 CFA, these funding decisions need to be made
- Interested LEAs should reach out to assigned regional consultant for technical assistance and support

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Coordinated Spending Guide

Coordinated Spending Guide

- Updated to align with ESSA and with our state's accountability model
- New initiatives and funding added
- Updated program descriptions
- In LEA Document Library in ePlan



Coordinated Spending Guide

Braiding and Blending Funds

Comprehensive Strategies to Support Activities that Drive Performance and Improve Outcomes for Tennessee Students

Office of Consolidated Planning and Monitoring | Oct. 2017

Revised: Feb. 2018



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Monitoring

Monitoring for 2018-19

- Risk assessment completed - May - June 2018
- Districts identified for monitoring - July 2018
 - Onsite
 - Desktop
 - Self
- Communication with districts identified for monitoring no later than August 13, 2018
- Additional information at ESSA Directors Institute
 - August 14-16
 - Registration opens
- Desktop monitoring pilot in 2018-19
 - More details to come

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Other Updates

New Student Codes: Foster Care

■ **Definition**

- Foster care students are children placed away from their parents or legal guardians by the Department of Children's Services (DCS).
- LEAs identify foster care students from the list that DCS provides School Nutrition each month.

■ **Student Classifications**

- Use FOS01-Foster Care to identify foster care students.

■ **Economically Disadvantaged (ED) Subgroup**

- Foster care students are part of the ED subgroup.
- Enter the J-Direct Certification of Economic Disadvantage student classification IN ADDITION to the FOS01-Foster Care student classification.

New Student Codes: Juvenile Detention

■ Juvenile Detention Centers

- As of 2018-19, student classifications will be added to EIS for students placed in each of the state's 17 juvenile detention centers.
- Each detention center will have a unique code (JDC01... JDC17).

Juvenile Court Referral Code—No Longer Used

■ Juvenile Court Referrals

- As of 2018-19, the juvenile court referral student classification (7) will not be collected in EIS.
- In 2017-18, its use has been limited to roughly 30 students in three districts.

Correlation of Course Codes for ESL

The updated course codes ensure:

- The ability to set the expectation for differentiation based on students' grade level.
- All ELs are being exposed to TN English language arts standards and to WIDA English language development standards.
- Accurate information is available for ordering assessments- All ELs are required to take their grade-level ELA TNReady Assessment
- Accurate data is available for research and audit purposes.
- Districts and schools have clear guidance on how ESL courses can be awarded credit and used as a graduation requirement.

Correlation of Course Codes for ESL

- Webinar (April 9) on ESL Course Codes available [here](#)
- The new ESL course codes go into effect for 2018-19.
- The new ESL course codes:
 - Are specific to grade levels
 - Begin with 63 and are all 4 digits between 6300 and 6316
 - Are taught by teachers holding specific teacher endorsements:
 - 301 – English as a Second Language
 - 490 – English as a Second Language pre-K-12

Direct Certification Considerations

- When reviewing options for within-district allocations for Title I, districts have several options: Direct Certification (DC), DC x the multiplier.
- Using the multiplier may not always be most beneficial – depending on which schools need to be served.
- Check your numbers both ways – with and without the multiplier
- District example...
 - Using multiplier made one school move above the 75% threshold and moved them up in the spiral (required to be served)



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Resources

Resources

- Coordinated Spending Guide
- Community Eligibility Provision
- Resources Guidelines Webinars
 - Title III Supplement not Supplant webinar
 - ESL Correlation of Course Codes webinar
 - Title I Schoolwide Consolidation webinar

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Please email questions. Responses are typically within one business day.

Questions?





Districts and schools in Tennessee will exemplify excellence and equity such that all students are equipped with the knowledge and skills to successfully embark on their chosen path in life.

Excellence | Optimism | Judgment | Courage | Teamwork

FRAUD, WASTE, or ABUSE

Citizens and agencies are encouraged to report fraud, waste, or abuse in State and Local government.

NOTICE: This agency is a recipient of taxpayer funding. If you observe an agency director or employee engaging in any activity which you consider to be illegal, improper or wasteful, please call the state Comptroller's toll-free Hotline:

1-800-232-5454

Notifications can also be submitted electronically at:

<http://www.comptroller.tn.gov/hotline>